

EXHIBIT D

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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IN RE: VALSARTAN, LOSARTAN, AND : MDL NO. 2875
IRBESARTAN PRODUCTS LIABILITY :
LITIGATION, :
:
THIS DOCUMENT RELATES TO: :
Duffy, et al. v. Solco Healthcare :
U.S., L.L.C., et al., :
Case No. 1:18-cv-15076-RBK-JS :
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VOLUME II

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Veritext Virtual Zoom Videotaped
deposition of MAHYAR ETMINAN, taken on Wednesday,
August 25, 2021, held in Vancouver, City of British
Columbia, Canada, commencing at 8:32 a.m., before
Jamie I. Moskowitz, a Certified Court Reporter and
Certified Livenote Reporter.

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1 the risk of cancer over time. I don't have any
2 specific data to, sort of, give you a specific
3 number right now.

4 BY MS. KAPKE:

5 Q You would agree with me that a person
6 who took a single pill for -- you know, one -- one
7 pill of valsartan that contained NDMA or NDEA would
8 not have an increased risk of cancer, correct?

9 A One pill over what period?

10 Q One day.

11 A No.

12 Q You don't agree or you do agree with
13 that?

14 A I agree with you that taking one pill
15 of valsartan for one day does not increase the risk
16 of cancer.

17 Q What about 30 days, so 30 days' worth
18 of pills?

19 A 30 days, probably not as well.

20 Q I'm going to push it out. How about
21 90 days?

22 A Again, less likely.

23 Q Another way you -- you framed the
24 question that you are evaluating was whether
25 systemic exposure to NDMA could cause cancer.